

ATK 7480 Flying Cloud Drive Minneapolis, MN 55344 -3720

www.atk.com

November 27, 2013

## **BY FEDERAL EXPRESS**

Ms. Cynthia Brown
Removal Enforcement Coordinator
Superfund Enforcement Assessment Section (6SF-TE)
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, TX 75202-2733

RE: Confidential Business Information Documents submitted in Response

to EPA's CERCLA §104(e) Information Request

Explo Systems, Inc.

Minden, Webster Parish, Louisiana

SSID No. A6GH

Dear Ms. Brown:

By this letter and accompanying documents, Alliant Techsystems Inc. ("ATK" or "the Company") is hereby providing a supplemental response to EPA's CERCLA information request, dated July 12, 2013, pertaining to the Explo Systems site at Camp Minden, LA. ATK received EPA's information request on August 12, 2013. ATK and EPA subsequently agreed upon a schedule for ATK's submission of responses to EPA's information request. ATK's initial response was submitted to EPA on September 10, 2013, and a second response was submitted on October 10, 2013. Additional documents responsive to EPA's information request were discovered recently when an ATK employee cleaned out her office just prior to departing the Company. Some of these documents are being provided to EPA by separate submission without a claim of confidentiality. The rest of the documents are enclosed with this letter.

ATK considers the enclosed documents to be Confidential Business Information in part or in their entirety. ATK has and continues to protect this Confidential Business Information from public disclosure. This information is not now, nor has it ever been, available to the public. Dissemination of this information within ATK itself is tightly limited to only those with a need to know. For example, electronic copies of the enclosed documents are available only on restricted computer sites within the Company and the custodians of hard copies take measures to ensure they are not available without a showing of a need to know their contents.

Disclosure of the contents of these documents would result in substantial harm to ATK's competitive business position. The Confidential Business Information in these documents would provide a road map to our competitors regarding ATK's corporate-wide strategies and tools for identifying,

9456886

Mr. Cynthia Brown November 27, 2013 Page 2

developing, and securing business. For example, disclosure of the Confidential Business Information in these documents to a competitor might allow that company to alter its business development strategies and tools to negate or overcome a competitive advantage that ATK can exploit in seeking new business. Furthermore, the disclosure of cost and pricing information for Type I TNT would cause substantial harm since ATK continues to compete with other companies selling Type I TNT.

For these reasons, ATK considers this information as Confidential Business Information and protects it from public disclosure. Accordingly, ATK is providing documents containing this Confidential Business Information by this separate submittal. Documents that are Confidential Business Information in their entirety are marked as "Alliant Techsystems Proprietary." For documents that are not Confidential Business Information in their entirety, but which contain Confidential Business Information, two versions are enclosed. In one version, each page where the Confidential Business Information may be found is marked "Alliant Techsystems Proprietary." A second version is redacted so that the Confidential Business Information in the document is blacked out. ATK requests that EPA likewise treat this information as Confidential Business Information in order to prevent its disclosure to the public, including ATK's potential business competitors.

If you should have any questions concerning ATK's claim of confidentiality for the enclosed documents, please contact me at (925) 351-2871.

Sincerely yours,

Alliant Techsystems Inc.

Jonathan S. Bode, P.E.

Director, Corporate Environmental Management

**Enclosures**